

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND

In re: : BK No. 15-11488  
LASALLE HEALTH SERVICE INC. : Chapter 7  
: Debtor(s) :

**MOTION FOR ENTRY OF APPEARANCE PRO HAC VICE**

1. ROBERT J. POULSON, hereby moves, together with the attached certification, to be admitted *pro hac vice* in the above case as counsel on the following grounds:

- The case involves the following complex area of the law, in which *pro hac vice* counsel specializes: \_\_\_\_\_.
- Pro hac vice* counsel's long-standing representation of the client: I have been Finalize Bankruptcy's attorney since its inception.
- The local trial bar lacks experience in the field of:  
\_\_\_\_\_.
- The case involves complex legal questions under the law of a foreign jurisdiction with which *pro hac vice* counsel is familiar, specifically:  
\_\_\_\_\_.
- The case requires extensive discovery in a foreign jurisdiction convenient to *pro hac vice* counsel, as follows: \_\_\_\_\_.
- Other: \_\_\_\_\_.

2. Local Counsel Requirement: Pursuant to LBR 9010-1(c), with the exception of representation as counsel to a debtor or trustee, an attorney may appear *pro hac vice* without a local attorney if the matter is uncontested. If, however, the matter is or becomes contested, then local counsel must enter an appearance at least seven days before the scheduled hearing.

In consideration of the instant motion for admission *pro hac vice*, movant avers:



Document Page 2 of 4  
No local counsel appearance is required at this time as the filing of

THE NOTICE OF OVER-BID does not constitute a contested matter. Movant further understands and agrees that if the matter becomes contested, then local counsel will enter an appearance at least seven days before the scheduled hearing.



Local counsel is required in connection with this matter and a certification by local counsel is included with this motion.

BY:

  
ROBERT J. POULSON, ESQ. (NYS ATTY REG NO. 3007770)  
29 PIONEER ST SUITE 301  
COOPERSTOWN, NY 13326  
T: 607-547-1195  
Email: rjp@poulsonlaw.com

Attorney for OVER-BIDDER, FINALIZE BANKRUPTCY, INC.

DATED: November 9, 2018

Cooperstown, NY

R.I. Local Form 9010-1.2  
Rev. 12/1/09

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND

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In re: :  
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LASALLE HEALTH SERVICE INC. :  
: BK No. 15-11488  
: Chapter 7  
Debtor(s) :  
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**ATTORNEY CERTIFICATION IN SUPPORT OF  
MOTION FOR ADMISSION *PRO HAC VICE***

1. I, ROBERT J. POULSON, certify that I am a member in good standing of the bar of the state(s) of NEW YORK and of the following federal district court bar(s) SDNY, EDNY, NDNY, without any restriction on my eligibility to practice, and that I understand my obligation to notify this Court immediately of any change respecting my status in this respect.

2. I have never been disciplined or sanctioned by any court or other body having disciplinary authority over attorneys; there are no disciplinary proceedings pending against me at this time; and I have never had my pro hac vice status revoked by any court. (If applicant has been sanctioned, disciplined or had any pro hac vice status revoked, please provide a full explanation.)

3. I have never been convicted of any crime other than minor traffic offenses.

4. I am currently admitted, and/or within the preceding 12 months have applied to be admitted, in the following bankruptcy and/or adversary proceeding cases in this district: NONE

5. I have read, acknowledge, and agree to observe and to be bound by the local rules and orders of this Court, including the Rules of Professional Conduct of the Rhode Island Supreme Court, as adopted by this Court as the standard of conduct for all attorneys appearing before it.



Pursuant to LBR 9010-1(c), local counsel is not required at this time as the matter is not contested. Counsel further understands and agrees that if the matter becomes contested, then local counsel will enter an appearance at least seven days before the scheduled hearing or the granting of within motion for permission to appear *pro hac vice* may be revoked.

Date: November 9, 2018

By: 

Attorney applying for *Pro Hac Vice* admission  
ROBERT J. POULSON, ESQ. (NYS ATTY  
REG NO. 3007770)

Firm name and address

POULSON LAW OFFICE

29 PIONEER STREET

COOPERSTOWN, NY 13326